

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

John Trenton Pendarvis,

Plaintiff,

vs.

Alan M. Wilson, Mark A. Keel, Hugh E. Weathers,
L.C. Knight, W. Jeffrey Young, Robert D. Cook,
Emory Smith, Jr., Joanne Lee, David S. Jones,
T. Stephen Lynch, Harley L. Kirkland, Wesley
Vorberger, Robert Kittle, Adam L. Whitsett, Frank
O’Neal, Jason Wells, Glenn Wood, John Neale,
Rhett Holden, Alden G. Terry, Derek M.
Underwood, J. Clint Leach, Aaron Wood, John
Stokes, Vanessa Elsalah, Brittany Jeffcoat, Eva
Moore, Ray Dixon, Frank Thompson, Robert
Krutak, Jonathan Calore, Charlie Scrubbs, and
Wayne Eaddy,

Defendants.

C/A No: 2:22-cv-03142-BHH-MHC

**PLAINTIFF’S RESPONSES TO
RULE 26.01 INTERROGATORIES**

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, as amended, Plaintiff herein submits the following responses to interrogatories as required by the Court.

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Plaintiff is unaware of any subrogation interests at this time.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: All claims tried by jury pursuant to the Seventh Amendment of the U.S. Constitution.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Plaintiffs are not a publicly owned company.

(D) State the basis for asserting your claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Claims involve questions of federal law, specifically 42 U.S.C § 1983 *et seq.* claims.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Plaintiff is unaware of this action being related to any other action filed in District Court.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

G. [Defendants only] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Not applicable.

Respectfully submitted by:

WUKELA LAW FIRM

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